

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**IHOP RESTAURANTS, LLC,**

**Plaintiff,**

**v.**

**LEN-W FOODS, INC.,**

**Defendant.**

**Case Number: 1:15-cv-02600-SCJ**

**DECLARATION OF ANDREW FLAKE**

I, Andrew B. Flake, hereby declare and certify as follows:

1. I am over 18 years of age and am competent to testify to the matters set forth herein.

2. I am a partner and member of the Litigation Practice Group at the law firm of Arnall Golden Gregory LLP ("AGG"), counsel of record to Plaintiff IHOP Restaurants, LLC. ("IHOP") in the above-styled action at AGG. I received a Bachelor of Arts from Vanderbilt University in 1996, a Juris Doctor and a Master of Laws from Duke University School of Law in 1999 and have been a member of the State Bar of Georgia since 1999. My practice focuses on complex business litigation, including franchise, intellectual property and competition-related disputes.

3. AGG has represented IHOP in the current dispute beginning with the action initiated by Defendant Len-W Foods and Leonardo Wilson (collectively, "Len-W"). AGG has provided services at each and every stage of the litigation to date, including: investigation of the facts underlying Len-W's claims; evaluation of IHOP's claims; preparation of the Notice of Removal, Motion to Dismiss and Strike, and Motion for Preliminary Injunction; preparation for and representation at the preliminary injunction hearing; attempts to enforce the injunction issued by the Court; and communications with counsel for Defendant.

4. AGG's services were provided by me and by associate attorney Eric Olson, a member of our Litigation Practice Group with five years of experience. Mr. Olson received a Bachelor of Arts from Gustavus Adolphus College in 2007 and a Juris Doctor from the Georgetown University Law Center in 2010. Mr. Olson has been a member of the Virginia State Bar since 2010 and the District of Columbia Bar since 2011.

5. AGG's services have also been provided by senior paralegal Angela Chambliss. Ms. Chambliss has worked in the legal field for more than a decade. Lora Ramsey, litigation support manager, provided technical and application

support for this action, and support services were also provided by Toussant Jackson, Court Paralegal, and filing clerk Patrick Maher.

6. AGG has billed IHOP for legal services on an hourly basis. The billing rates for the attorneys and paralegals who have provided services to IHOP are listed below for 2015:

Attorneys / Paralegals	2015 Rate
Andrew Flake	\$465 / hour
Eric Olson	\$260 / hour
Angela Chambliss	\$215 / hour
Lora Ramsey	\$205 / hour
Patrick Maher	\$125 / hour
Toussant Jackson	\$65 / hour

7. AGG has provided IHOP with monthly invoices showing the tasks performed and costs and fees incurred in this matter. True and correct copies of those invoices are attached hereto as Exhibit A. Where applicable, certain portions of the billing descriptions in the invoices have been redacted to protect work product and/or attorney-client privilege (and in one case, an unrelated

expense item of \$15.64 was removed and the corresponding invoice total updated).

8. I have personal knowledge relating to AGG's timekeeping and billing records including as they relate to this action. In my professional opinion, these attorney's fees and costs are fair, reasonable and customary for the services rendered.

9. I also am familiar with and generally aware of the rates charged by law firms and lawyers practicing in the Atlanta area. The rates charged by AGG are comparable to those charged by comparable law firms in the Atlanta area.

10. The total amount of attorney's fees for which IHOP seeks reimbursement, and which are included in the attached invoices, is \$68,787.45.

11. The total amount of costs for which AGG seeks reimbursement is \$225.07, based upon expense items reflected in the attached invoices. These cost items represent expenses actually occurred in the furtherance of AGG's representation of IHOP in this matter.

12. In addition to time reflected in the invoices for which it seeks reimbursement, IHOP will have incurred at least an additional \$3,000 in preparation of its Motion for attorney's fees and associated filings. Therefore, the total amount of attorney's fees and expenses IHOP seeks associated with its effort

to enforce the Franchise Agreement is \$72,012.52. These fees and costs relate to IHOP's efforts to ensure compliance with its Franchise Agreement and to obtain and implement the relief provided for in the order granting IHOP's motion for preliminary injunction. In my opinion, the total is reasonable, considering *inter alia* the importance to IHOP of the relief sought, the duration and complexity of the litigation; the preparation of complex substantive and procedural filings, including the Notice of Removal, IHOP's the Motion to Dismiss and Strike, and the Motion for Preliminary Injunction.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: This 23rd day of February, 2016.

  
Andrew B. Flake

# EXHIBIT A



IHOP Restaurants, LLC

September 18, 2015

Invoice #660690

REDACTED

REDACTED

**For Legal Services Rendered In Connection With:****Client/Matter #32324-1****Len-W Foods, Inc.**

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>DESCRIPTION</u>
07/17/15	E. Olson	0.80	\$208.00	Conference call with A. Flake regarding new matter; review documents from client
07/17/15	T. Jackson	0.50	\$32.50	Traveled to Fulton Superior to obtain copies in case
07/17/15	A. Flake	2.90	\$1,348.50	Analysis of documents and other client information
07/17/15	L. Ramsey	0.30	\$61.50	Prepare casemap database for team review
07/18/15	E. Olson	2.10	\$546.00	As directed by A. Flake research REDACTED
				REDACTED
07/19/15	E. Olson	3.90	\$1,014.00	Research REDACTED draft notice of removal, state notice of removal, and notice to plaintiffs of notice of removal
07/20/15	E. Olson	2.40	\$624.00	Revise affidavit; edit and review Notice of Filing Notice of Removal and Notice of Removal; review exhibits and reports from client; prepare exhibits [2.0 hrs -no charge]

A LATE CHARGE OF 1-1/2% PER MONTH WILL BE APPLIED TO BALANCES OUTSTANDING OVER 60 DAYS

FE# 58 0543673

Atlanta, GA | Washington, DC

ALL BILLING RELATED QUERIES: Phone: 404.873.8500 | Fax: 404.873.8501

IHOP Restaurants, LLC

Client/Matter #32324-1

September 18, 2015

Invoice #660690

Sean C. Kulka

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>DESCRIPTION</u>
07/20/15	A. Flake	7.60	\$3,534.00	Analysis of underlying reports, audits, and Inspections; review fax as set forth in model declarations; revisions to notices of removal and review of legal authority in connection with same; finalize declaration of Charles Scaccia; brief communications with client concerning litigation strategy; analysis of timing in connection with arbitration motion; review of authority in connection with preliminary injunction motion and begin structuring preliminary injunction memorandum of law; analysis of franchise agreement and party communications in connection with franchise termination
07/21/15	E. Olson	3.90	\$1,014.00	Revise exhibits; finalize Notice of Removal; conference call with A. Flake and A. Chambliss; revise civil cover sheet; begin preparing Motion to Sever and Motion to Compel Arbitration
07/21/15	A. Flake	2.10	\$976.50	Finalize removal papers; communications regarding litigation strategy
07/21/15	P. Maher	1.70	\$212.50	Prepare documents for court filing
07/21/15	A. Chambliss	0.60	\$129.00	Start gathering reports for OAR binder.
07/21/15	A. Chambliss	3.10	\$666.50	Review, revise Notice of Removal, prepare exhibits for filing with same, prepare service copies for mailing.
07/22/15	E. Olson	2.10	\$546.00	Draft Motion to Sever; Revise motion to sever, call with A. Flake regarding strategy
07/22/15	A. Flake	4.00	\$1,860.00	Drafting preliminary injunction papers, including declaration revisions; prepare first draft of Motion to Sever and to dismiss based on arbitration clause; dead correspondence to opposing counsel
07/22/15	A. Chambliss	1.30	\$279.50	Finalize Notice of Removal papers for filing with the Superior Court of Fulton County, prepare service copies for mailing.

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IHOP Restaurants, LLC

Client/Matter #32324-1

September 18, 2015

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>DESCRIPTION</u>
07/22/15	A. Chambliss	1.30	\$279.50	Continue organizing OAR reports for binder.
07/22/15	L. Ramsey	0.30	\$61.50	Prepare workshare site for team use
07/23/15	A. Flake	3.80	\$1,767.00	Drafting preliminary injunction papers, including declaration revisions; prepare first draft of Motion to Sever and to Dismiss based on arbitration clause; dead correspondence to opposing counsel
07/23/15	E. Olson	2.30	\$598.00	Prepare Answer and Counterclaim; revise motion to strike and to dismiss
07/23/15	A. Chambliss	1.30	\$279.50	Draft Amended Certificate of Service, e-file same, e-file Certificate of Interested Persons, prepare service copies for mailing.
07/24/15	E. Olson	1.40	\$364.00	Revise affidavits; review
07/24/15	A. Flake	4.20	\$1,953.00	Continue preparation of declarations; brief communications with client regarding same; assess next steps in litigation strategy
07/24/15	P. Maher	1.90	\$237.50	Collect documents and prepare notebook for attorney review
07/24/15	A. Chambliss	2.30	\$494.50	Complete OAR binder.
07/27/15	E. Olson	5.40	\$1,404.00	Finalize Motions to Sever and Dismiss/Compel arbitration; prepare answer and counterclaim; research REDACTED review documents from client [3.0 hrs - no charge]
07/27/15	A. Flake	2.80	\$1,302.00	Finalize declarations of Towery, Cheung, Buckley, and Guerra; document analysis and communications regarding same
07/28/15	A. Flake	3.10	\$1,441.50	Revisions to preliminary injunction brief

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IHOP Restaurants, LLC

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September 18, 2015

Invoice #660690

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>DESCRIPTION</u>
07/28/15	E. Olson	1.60	\$416.00	Review affidavits from J. Towery, L. Cheong, C. Guerra, and T. Shoplik; edit and cite check Memorandum in support of motion for Preliminary Injunction
07/28/15	A. Chambliss	3.60	\$774.00	Review, revise, gather and prepare exhibits for e-filing Answer & Counterclaim and Motion for Preliminary Injunction.
07/29/15	E. Olson	3.90	\$1,014.00	Edit and revise memorandum in support of motion for preliminary injunction, answer and counterclaims, motion for preliminary injunction, motion to sever, and memorandum in support of motion to sever; conference with A. Flake and A. Chambliss [1.0 hrs no charge]
07/29/15	A. Flake	4.70	\$2,185.50	Revisions to motion to sever; revisions to motion to dismiss; develop argument in connection with same
07/30/15	E. Olson	3.10	\$806.00	Review and Finalize Motion for Preliminary Injunction and Answer and Counterclaims; prepare exhibits [2.0 hrs - no charge]
07/30/15	A. Chambliss	4.10	\$881.50	Multiple phone calls and emails to and from Andrew Flake and Eric Olson regarding Answer and Motion for Preliminary Injunction, review and revise Answer and Motion for Preliminary Injunction, organize exhibits, prepare same for e-filing, e-file Answer and Motion for Preliminary Injunction, prepare same service copies for mailing.
07/30/15	A. Flake	8.80	\$4,092.00	Revisions to answer and counterclaims; revisions to preliminary injunction brief and research in connection with same; analysis of case law to supplement preliminary injunction brief; update relief requested in preliminary injunction motion; update client regarding matter status; finalize preparations for filing
07/31/15	A. Flake	0.70	\$325.50	Correspond with opposing counsel; planning for next steps

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IHOP Restaurants, LLC

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September 18, 2015

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>DESCRIPTION</u>
07/31/15	A. Chambliss	0.40	\$86.00	Update electronic pleadings index.
08/03/15	A. Flake	0.10	\$46.50	Communications with client concerning matter status
08/04/15	A. Flake	1.00	\$465.00	Brief call with Christine Son concerning REDACTED ; conduct Rule 26(f) conference and follow up regarding same
08/06/15	A. Chambliss	0.10	\$21.50	Review email from process server and forward same to attorneys.
08/06/15	E. Olson	0.40	\$104.00	Prepare proposed consent order regarding severance of claims against KDI Atlanta Mall, LLC
08/07/15	A. Flake	0.60	\$279.00	Advise on next steps in Len-W matter
08/11/15	E. Olson	0.30	\$78.00	Retrieve Judge Jones' pretrial instructions and review
08/12/15	A. Chambliss	0.20	\$43.00	Update electronic pleadings index to include KDI Answer and Counterclaim and Certificate of Interested Persons.
08/12/15	E. Olson	1.30	\$338.00	Prepare draft of Rule 26(f) report
08/17/15	A. Flake	0.40	\$186.00	Advise on next steps in Len-W matter; communication regarding same
08/17/15	A. Chambliss	0.10	\$21.50	Review of Certificate of Interested Persons, multiple emails to and from Drew Stevens regarding same.
08/18/15	A. Flake	1.30	\$604.50	Prepare 26(f) planning report; communications with opposing counsel regarding same; brief update to client
08/18/15	A. Chambliss	0.10	\$21.50	Docket critical case deadlines.
08/19/15	A. Flake	0.50	\$232.50	Communications with opposing counsel; follow up on 26(f) report
08/20/15	A. Flake	1.20	\$558.00	Finalize and file rule 26(f) report; brief update to client

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IHOP Restaurants, LLC

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September 18, 2015

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>DESCRIPTION</u>
08/20/15	E. Olson	0.20	\$52.00	Review File Copy of Rule 26 (f) report
08/24/15	A. Flake	1.20	\$558.00	Prepare and revise proposed order concerning severance and arbitration
08/24/15	E. Olson	1.50	\$390.00	Revise consent order regarding severance; draft consent motion for expedited hearing; draft consent motion regarding expedited hearing
08/25/15	A. Flake	0.90	\$418.50	Revise and prepare proposed orders
08/25/15	E. Olson	0.50	\$130.00	Review order to show cause; review filings and documents for jurisdictional information; correspondence with A. Flake
08/26/15	A. Flake	4.30	\$1,999.50	Analysis of case law and preparation for hearing; follow-up regarding scheduling
08/27/15	A. Flake	0.20	\$93.00	Communications with client concerning matter status
08/28/15	A. Flake	1.70	\$790.50	Develop supplemental filing concerning jurisdiction; communications with opposing counsel; brief update regarding matter status
08/31/15	A. Flake	1.00	\$465.00	Continue hearing preparation, including review of authority and exhibit analysis

**Total Hours** **119.40**

**Subtotal** **\$41,710.50**

**Less 0.0 % Discount** **-4,171.05**

**Total For Services** **\$37,539.45**

**EXPENSES**

LEXIS legal research for July 2015 \$134.47

VENDOR: Petty Cash/ c/o Toussant Jackson; INVOICE#: \$5.45  
 PETTYCASH-8/10/15; DATE: 8/11/2015. Superior Court of Fulton County

Duplicating Expenses \$49.10

IHOP Restaurants, LLC

Client/Matter #32324-1

September 18, 2015

Invoice #660690

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**EXPENSES**

Total Expenses	\$189.02
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	<u>Fees</u>	<u>Disbursements</u>	<u>Total</u>
CURRENT CHARGES:	\$37,539.45	\$189.02	\$37,728.47
<b>Total Balance Due:</b>	<b>\$37,539.45</b>	<b>\$189.02</b>	<b>\$37,728.47</b>

Total This Statement	\$37,728.47
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**Attorney and Paralegal Summary**

	<u>Hours Worked</u>	<u>Billed Per Hour</u>	<u>Bill Amount</u>
Jackson, Toussant S.	0.50	\$65.00	\$32.50
Ramsey, Lora A.	0.60	\$205.00	\$123.00
Chambliss, Angela O.	18.50	\$215.00	\$3,977.50
Maher, Patrick J.	3.60	\$125.00	\$450.00
Flake, Andrew B.	59.10	\$465.00	\$27,481.50
Olson, Eric D.	37.10	\$260.00	\$9,646.00
Total All Attorneys	119.40		\$41,710.50



IHOP Restaurants, LLC  
**REDACTED**

October 8, 2015  
 Invoice #662098  
 REDACTED

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**For Legal Services Rendered In Connection With:**

**Client/Matter #32324-1**

**Len-W Foods, Inc.**

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>DESCRIPTION</u>
09/01/15	A. Chambliss	0.10	\$21.50	Docket Motion for Preliminary Injunction hearing date.
09/01/15	A. Flake	1.80	\$837.00	Continue preparation for preliminary injunction hearing
09/02/15	A. Chambliss	1.00	\$215.00	Draft Motion for Technology Order, docket critical case deadlines from Scheduling Order.
09/02/15	A. Flake	0.50	\$232.50	Communications regarding hearing preparation
09/02/15	A. Chambliss	2.00	\$430.00	Hearing preparation, including, but not limited to gathering and scanning exhibits.
09/03/15	A. Flake	1.80	\$837.00	Continue hearing preparation, including review of authority and exhibit analysis
09/03/15	A. Chambliss	1.00	\$215.00	Organize potential documents to be used as exhibits for Injunction hearing.
09/04/15	A. Flake	0.70	\$325.50	Communications regarding hearing preparation
09/08/15	A. Flake	2.10	\$976.50	Continue preparation for preliminary injunction hearing

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A LATE CHARGE OF 1-1/2% PER MONTH WILL BE APPLIED TO BALANCES OUTSTANDING OVER 60 DAYS

FBI# 58-0543673

Atlanta, GA | Washington, DC

ALL BILLING RELATED QUERIES: Phone: 404.873.8500 | Fax: 404.873.8501

IHOP Restaurants, LLC

Client/Matter #32324-1

October 8, 2015

Invoice #662098

Sean C. Kulka

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>DESCRIPTION</u>
09/09/15	A. Flake	2.20	\$1,023.00	Continue hearing preparation, including review of authority and exhibit analysis
09/09/15	A. Chambliss	1.50	\$322.50	Prepare manuals for use as possible hearing exhibits.
09/10/15	A. Flake	4.20	\$1,953.00	Review and analysis of response brief
09/10/15	A. Chambliss	2.30	\$494.50	Multiple emails to and from Andrew Flake regarding public inspection reports, internet research to obtain all public inspection reports for Greenbriar location, telephone call to Health Department regarding obtaining additional inspection reports, email request to Health Dept. regarding same, organize additional documents to be used as exhibits for Injunction hearing.
09/11/15	A. Flake	5.30	\$2,464.50	Continue hearing preparation, including review of authority and exhibit analysis
09/11/15	A. Chambliss	3.40	\$731.00	Prepare case law index binder, print and organize guest complaints for attorney review, draft Motion for Technology Order, setup Workshare site.
09/14/15	A. Chambliss	0.20	\$43.00	Review and e-file Declaration of Charles Scaccia.
09/14/15	A. Chambliss	6.00	\$1,290.00	Continue hearing preparation, including, but not limited to loading documents into Trial Director, assigning exhibits number and creating screenshots, draft Timeline, review and e-file Charles Scaccia Declaration.
09/15/15	A. Flake	1.20	\$558.00	Continue hearing preparation, including review of authority and exhibit analysis
09/15/15	A. Chambliss	6.00	\$1,290.00	Continue hearing preparation, including, but not limited to loading documents into Trial Director, assigning exhibits number and creating screenshots, revising Timeline and creating pivot table.

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IHOP Restaurants, LLC

Client/Matter #32324-1

October 8, 2015

Invoice #662098

Sean C. Kulka

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>DESCRIPTION</u>
09/16/15	A. Flake	6.00	\$2,790.00	Continue hearing preparation, including review of authority and exhibit analysis
09/16/15	A. Chambliss	10.00	\$2,150.00	Final hearing preparation, including, but not limited to, reviewing outline for exhibits referencing, scanning and loading hearing exhibits, coordinating with vendor regarding color copies of presentation, pull cases, prepare hearing slide presentation.
09/17/15	A. Flake	4.00	\$1,860.00	Finalize hearing preparation; attend and conduct hearing on preliminary injunction; update to client regarding hearing and matter status
09/17/15	A. Chambliss	10.00	\$2,150.00	Final preparation for hearing, scan and prepare additional hearing exhibits, prepare color copies of exhibits and powerpoint presentation, attend hearing, begin draft of Order granting Motion for Injunction.
09/18/15	A. Flake	1.10	\$511.50	Analysis and review of order; communications with opposing counsel; communications with client concerning next steps
09/22/15	A. Flake	0.30	\$139.50	Communications concerning order compliance
09/24/15	A. Flake	0.20	\$93.00	Review and respond to communications from opposing counsel
09/25/15	A. Flake	0.40	\$186.00	Correspond with opposing counsel; planning for next steps
09/28/15	A. Flake	0.10	\$46.50	Follow up communication concerning order compliance
09/30/15	A. Flake	0.20	\$93.00	Communications with Len-W counsel regarding debranding
			<b>Total Hours</b>	<b>75.60</b>
			<b>Total For Services</b>	<b>\$24,279.00</b>

EXPENSES



IHOP Restaurants, LLC

Client/Matter #32324-1

October 8, 2015

Invoice #662098

Sean C. Kulka

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**EXPENSES**

LEXIS legal research for August 2015	\$2.25
VENDOR: Chambliss, Angela O.; INVOICE#: IHOPUSDC; DATE: 9/17/2015 - Parking to attend Preliminary Injunction Hearing	\$15.00
VENDOR: Flake, Andrew B.; INVOICE#: PARKING-9/17/15; DATE: 9/24/2015 - Parking- IHOP/Len-W Foods hearing	\$15.00
Duplicating Expenses	\$3.80
<b>Total Expenses</b>	<b>\$36.05</b>

	<b><u>Fees</u></b>	<b><u>Disbursements</u></b>	<b><u>Total</u></b>
<b>REDACTED</b>			
CURRENT CHARGES:	\$24,279.00	\$36.05	\$24,315.05
<b>REDACTED</b>			

**REDACTED****Attorney and Paralegal Summary**

	<b><u>Hours Worked</u></b>	<b><u>Billed Per Hour</u></b>	<b><u>Bill Amount</u></b>
Chambliss, Angela O.	43.50	\$215.00	\$9,352.50
Flake, Andrew B.	32.10	\$465.00	\$14,926.50
Total All Attorneys	75.60		\$24,279.00



IHOP Restaurants, LLC  
**REDACTED**

November 9, 2015  
 Invoice #664449  
 REDACTED

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**For Legal Services Rendered In Connection With:**

**Client/Matter #32324-1**

**Len-W Foods, Inc.**

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>DESCRIPTION</u>
10/01/15	E. Olson	2.10	\$546.00	Research availability of contempt sanctions against officers, owners, and non-parties to court orders under 11th Circuit precedent
10/01/15	A. Flake	1.70	\$790.50	Research and prepare draft of Motion for Contempt; communications with client and opposing counsel regarding compliance with PI order
10/02/15	A. Flake	1.10	\$511.50	Communications concerning order compliance
10/07/15	A. Flake	0.30	\$139.50	Communications concerning order compliance
10/08/15	A. Flake	0.20	\$93.00	Communications concerning order compliance
10/08/15	E. Olson	0.40	\$104.00	Review motion to show cause
10/12/15	E. Olson	5.80	\$1,508.00	Research, draft, and edit motion to show cause
10/12/15	A. Flake	0.10	\$46.50	Communications concerning order compliance
10/13/15	A. Flake	0.70	\$325.50	Communications with Len-W counsel regarding debranding

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A LATE CHARGE OF 1-1/2% PER MONTH WILL BE APPLIED TO BALANCES OUTSTANDING OVER 60 DAYS

FEI# 58-0543673

Atlanta, GA | Washington, DC

ALL BILLING RELATED QUERIES: Phone: 404.873.8500 | Fax: 404.873.8501

IHOP Restaurants, LLC

Client/Matter #32324-1

November 9, 2015

Invoice #664449

Sean C. Kulla

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<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>DESCRIPTION</u>
10/14/15	T. Jackson	1.00	\$65.00	Traveled to Greenbriar IHOP to obtain pics to see if IHOP signs were taken down
10/21/15	A. Flake	0.20	\$93.00	Advise on next steps in Len-W matter
10/30/15	A. Flake	0.10	\$46.50	Advise on next steps in Len-W matter
<b>Total Hours</b>				<b>13.70</b>
<b>Total For Services</b>				<b>\$4,269.00</b>

EXPENSES

REDACTED

**Total Expenses** REDACTED

	<u>Fees</u>	<u>Disbursements</u>	<u>Total</u>
REDACTED			
CURRENT CHARGES:	\$4,269.00	REDACTED	REDACTED \$4,269.00
REDACTED			

REDACTED

Attorney and Paralegal Summary

	<u>Hours Worked</u>	<u>Billed Per Hour</u>	<u>Bill Amount</u>
Jackson, Toussant S.	1.00	\$65.00	\$65.00
Flake, Andrew B.	4.40	\$465.00	\$2,046.00
Olson, Eric D.	8.30	\$260.00	\$2,158.00
Total All Attorneys	13.70		\$4,269.00



IHOP Restaurants, LLC

REDACTED

December 18, 2015

Invoice #668330

REDACTED

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**For Legal Services Rendered In Connection With:**
**Client/Matter #32324-1****Len-W Foods, Inc.**

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>DESCRIPTION</u>
11/05/15	A. Flake	0.20	\$93.00	Review supplemental authority concerning contempt sanctions; call to Christine Son
11/05/15	E. Olson	2.10	\$546.00	Research on calculation of sanctions for contempt of court order
11/13/15	A. Flake	0.80	\$372.00	Brief call with Christine Son; prepare communication to Len-W counsel regarding failure to comply with September order
11/19/15	A. Flake	0.10	\$46.50	Communication with George Lawson; brief email with the clients concerning REDACTED
			<b>Total Hours</b>	<b>3.20</b>
			<b>Subtotal</b>	<b>\$1,057.50</b>
			<b>Less -10.0 % Discount</b>	<b>-105.75</b>
			<b>Total For Services</b>	<b>\$951.75</b>

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A LATE CHARGE OF 1-1/2% PER MONTH WILL BE APPLIED TO BALANCES OUTSTANDING OVER 60 DAYS

FEI# 58-0543673

Atlanta, GA | Washington, DC

ALL BILLING RELATED QUERIES: Phone: 404.873.8500 | Fax: 404.873.8501

IHOP Restaurants, LLC

Client/Matter #32324-1

December 18, 2015

Invoice #668330

Sean C. Kulka

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	<u>Fees</u>	<u>Disbursements</u>	<u>Total</u>
CURRENT CHARGES:	\$951.75	\$0.00	\$951.75
<b>Total Balance Due:</b>	<b>\$951.75</b>	<b>\$0.00</b>	<b>\$951.75</b>
<b>Total This Statement</b>			<b>\$951.75</b>

**Attorney and Paralegal Summary**

	<u>Hours Worked</u>	<u>Billed Per Hour</u>	<u>Bill Amount</u>
Flake, Andrew B.	1.10	\$465.00	\$511.50
Olson, Eric D.	2.10	\$260.00	\$546.00
Total All Attorneys	3.20		\$1,057.50



IHOP Restaurants, LLC

January 26, 2016

Invoice #670584

REDACTED

REDACTED

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**For Legal Services Rendered In Connection With:****Client/Matter #32324-1****Len-W Foods, Inc.**

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>DESCRIPTION</u>
12/11/15	A. Flake	1.30	\$604.50	Analysis of potential motion for attorney's fees; advise client regarding same; look at steps necessary to conclude litigation and outline same

<b>Total Hours</b>	<b>1.30</b>
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<b>Subtotal</b>	<b>\$604.50</b>
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<b>Less -10.0 % Discount</b>	<b>-60.45</b>
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<b>Total For Services</b>	<b>\$544.05</b>
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	<u>Fees</u>	<u>Disbursements</u>	<u>Total</u>
CURRENT CHARGES:	\$544.05	\$0.00	\$544.05
<b>Total Balance Due:</b>	<b>\$544.05</b>	<b>\$0.00</b>	<b>\$544.05</b>

<b>Less Cash On Hand</b>	<b>(544.05)</b>
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<b>Total This Statement</b>	<b>\$0.00</b>
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A LATE CHARGE OF 1-1/2% PER MONTH WILL BE APPLIED TO BALANCES OUTSTANDING OVER 60 DAYS

FEI# 58-0543673

Atlanta, GA | Washington, DC

ALL BILLING RELATED QUERIES: Phone: 404.873.8500 | Fax: 404.873.8501

**IHOP Restaurants, LLC**

**Client/Matter #32324-1**

**January 26, 2016**

**Invoice #670584**

**Sean C. Kulka**

**Page 2**

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**Attorney and Paralegal Summary**

	<u>Hours Worked</u>	<u>Billed Per Hour</u>	<u>Bill Amount</u>
Flake, Andrew B.	1.30	\$465.00	\$604.50
Total All Attorneys	1.30		\$604.50



IHOP Restaurants, LLC

REDACTED

January 26, 2016

Invoice #670585

REDACTED

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**For Legal Services Rendered In Connection With:**

Client/Matter #32324-1

Len-W Foods, Inc.

<u>DATE</u>	<u>TIMEKEEPER</u>	<u>HOURS</u>	<u>AMOUNT</u>	<u>DESCRIPTION</u>
12/15/15	A. Flake	0.20	\$93.00	Planning in connection with possible motion for attorneys fees
12/15/15	A. Chambliss	0.60	\$129.00	Gather and prepare invoices for review for Motion for Attorneys Fees.
12/21/15	A. Flake	1.50	\$697.50	Prepare correspondence related to request for payment of fees
12/22/15	A. Flake	0.80	\$372.00	Drafting motion for attorneys fees
12/30/15	A. Flake	0.10	\$46.50	Drafting motion for attorneys fees and associated brief
<b>Total Hours</b>				<b>3.20</b>
<b>Subtotal</b>				<b>\$1,338.00</b>
<b>Less -10.0 % Discount</b>				<b>-133.80</b>
<b>Total For Services</b>				<b>\$1,204.20</b>

	<u>Fees</u>	<u>Disbursements</u>	<u>Total</u>
CURRENT CHARGES:	\$1,204.20	\$0.00	\$1,204.20
<b>Total Balance Due:</b>	<b>\$1,204.20</b>	<b>\$0.00</b>	<b>\$1,204.20</b>

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A LATE CHARGE OF 1-1/2% PER MONTH WILL BE APPLIED TO BALANCES OUTSTANDING OVER 60 DAYS

FEI# 58-0543673

Atlanta, GA | Washington, DC

ALL BILLING RELATED QUERIES: Phone: 404.873.8500 | Fax: 404.873.8501



IHOP Restaurants, LLC

Client/Matter #32324-1

January 26, 2016

Invoice #670585

Sean C. Kulka

Page 2

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<u>Fees</u>	<u>Disbursements</u>	<u>Total</u>
	Less Cash On Hand	(1,204.20)
	Total This Statement	\$0.00

**Attorney and Paralegal Summary**

	<u>Hours Worked</u>	<u>Billed Per Hour</u>	<u>Bill Amount</u>
Chambliss, Angela O.	0.60	\$215.00	\$129.00
Flake, Andrew B.	2.60	\$465.00	\$1,209.00
Total All Attorneys	3.20		\$1,338.00